



Listener-Supported Public Radio  **91.3 fm** **From Murray State University**
 2018 University Station ~ Murray, KY 42071 ~ 800-599-4737 ~ Fax 270-809-4667 ~ www.wkms.org ~ wkms@murraystate.edu

April 25, 2008

Received & Inspected

APR 28 2008

FCC Mail Room

Marlene H. Dortch, Secretary

Federal Communications Commission

Office of the Secretary

9300 East Hampton Drive

Capitol Heights, MD 20743

RE: MM Docket No. 04-233

Dear Ms. Dortch:

Thank you for an opportunity to comment on the "Localism in Broadcasting" initiative on behalf of WKMS-FM, Murray, Kentucky. We believe the proposal is unnecessary and would challenge our small staff and budget, stretching both even further than they are already extended. We are a non-commercial educational FM licensed to Murray State University. Our licensee's Board of Regents is involved in our strategic planning process, and we are dependent on the financial support of our listeners as well. We provide our listeners with a toll-free line, an interactive website at wkms.org., and regular e-newsletters in order to make their involvement in our station easier. Our station staff members are active in several organizations in our region including, but not limited to serving on the board of Directors of the Paducah Symphony Orchestra, Murray Main Street, the Rape Crisis Center and others. Part of our website is an interactive community events service that is well used and we present a week-daily Datebook service over the air, which is also streamed on the web, covering activities from north western Tennessee to southernmost Illinois.



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As we are listener supported, we invite community leaders from education, business, government and more to come on the air and speak on behalf of their community's use of our service. We subscribe to six local newspapers and keep up with the regional news that way, addressing our own local news effort to issues that are consistently addressed by the print folks.

We maintain a two professional full-time staff news department and yearly train 4 to 6 student interns in public radio news production, covering issues and human affairs stories. We broadcast a monthly hour long program of conversation with the President of Murray State University, our community of license's largest employer. It is part of our commitment to offer our area in-depth listening experiences in news and public affairs as well as a variety of music forms. We present regional newscasts within our national news programs. We record and produce commentaries offered by listeners and regional experts and policy makers. We produce long-form radio news features for a station magazine show airing at noon Monday through Thursday weekly. We produce bluegrass concerts and showcase local bluegrass musicians in live on-air performance. We record concerts of the Paducah Symphony Orchestra, producing them for on-air. We open give microphones and time for regional and national political speeches and debates. We maintain an electronic news exchange with the other public radio services in Kentucky, including funding a full-time reporter in the capitol. As we are located in far western Kentucky this capitol bureau is especially important to our overall service. We are also pursuing partnerships with

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Kentucky Educational Television and with other public radio stations to add more public affairs and music programming of particular relevance to the Commonwealth.

We are pursuing the ability to program a radio reading service for the print-impaired on our digital transmission service or through our web stream, depending on the technology. We offer a radio reader of current literary works every weeknight.

Since we depend on being relevant to our region (27 counties wide), my station does not need any new regulatory obligations to ensure that we deliver public service. We appreciate the flexibility we have now to serve our listeners. Were we to be required to have station personnel at our station (which is in its community of license) 24 hours a day it would result in a drastic change in our current budget. It would also take us back to the days when student operators were on the board overnight and student "stuff" inevitably brought about issues with security and operational proficiency. We were encouraged to use automation during our evening and overnight hours to save money and to make our station more listenable. We would not want to go backwards in quality.

Quite frankly, any further reporting or new license renewal processing guidelines would increase our administrative costs. We want to put all available resources into programming, not administration. The current reports we file in our public files and with the Commission make sense and are efficient in documenting how we serve our region and what we serve them with.

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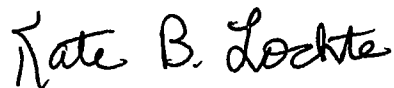
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In summary, we would surely appreciate the Commission's consideration that public radio stations are unique in that their entire schedules are devoted to public service rather than intermittent public service announcements and local talk-shows. Our mission is to inform, entertain, and enrich with in-depth, important programming that reflects current affairs, history and cultures.

We work with resources that are already limited by regulation and by the character of what we do. We already work within a University structure that is bound by law to be directed by a public board that must meet in public and invite public comment. Please do not adopt new localism rules. Thank you for listening and considering our station as one that is already, for nearly 4 decades now, committed to and serving our local communities with a quality, consistent schedule of long-form news and a variety of significant music not offered over the air by any other station in our area.

Sincerely yours,

A handwritten signature in cursive script that reads "Kate B. Lochte". The signature is written in dark ink and is positioned above the printed name.

Kate B. Lochte

Station Manager